

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In Re:
Kathleen M Alexander

Debtor(s)

Finance of America Mortgage LLC
Movant

v.

Kathleen M Alexander
Respondent(s)

Chapter: 13

Case No: 20-14505-amc

Related to Docs: 2 & 16

**CONSENT ORDER/STIPULATION SETTLING OBJECTION TO CONFIRMATION AND
PROVIDING IMMEDIATE RELIEF FROM AUTOMATIC STAY**

AND NOW upon the Objection of Finance of America Mortgage LLC (hereinafter "Creditor"), through its Counsel, Stern & Eisenberg PC, and the parties agreeing to the entry of the Order settling the Objection and for cause shown, it is hereby ORDERED AND DECREED as follows:

1. Debtor filed the instant bankruptcy action on November 20, 2020.
2. On January 15, 2021, Creditor filed an Objection to Confirmation (Doc. 16) of Debtor's November 11, 2020 Chapter 13 Plan (Doc. 2).
3. Debtor (and/or non-filing co-debtor, George Alexander) proposes to pay Creditor's pre-petition arrears and monthly mortgage payments entirely outside of the Chapter 13 Bankruptcy.
4. As a result of this treatment, Debtor and Creditor agree that Creditor should have immediate relief from the automatic stay pursuant to 11 U.S.C. §362.
5. Facsimile signatures shall be as valid as original signatures and this Consent Order/Stipulation may be signed in counterparts.

By signing this Stipulation/Consent Order, Debtor's Counsel represents that Debtor is familiar with and understand the terms of the Stipulation/Consent Order and agree to said terms regardless of whether Debtor has actually signed said stipulation. Seen and agreed by the parties on the date set forth below:

/s/Daniel P. Jones

Daniel P. Jones, Esq.
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111
Email: djones@sterneisenberg.com
Counsel for Creditor
Date: February 4, 2021



Brad J. Sadek, Esq.
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
brad@sadeklaw.com
Counsel for Debtor

Date: 2/4/21

/s/Jack Miller

William C. Miller, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105

Date: 02/11/2021

*No objection to stipulation terms, without prejudice to any
Trustee rights and remedies